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Via FedEx

**MEMO ENDORSED**

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The Honorable Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 650  
New York, N.Y. 10007

Re: Dolphin Direct Equity Partners, LP and Race Car Simulation Corp., v.  
Interactive Motorsports and Entertainment Corporation, Perfect Line,  
Inc., Race Car Simulators, Inc. and William Donaldson. Case No.  
08 CV 01558

Dear Judge Berman:

The undersigned appearing on behalf of all Defendants herein requests leave to withdraw from this case under Local Rule 1.4, due to the fact that there has been a significant degradation of the attorney client relationship. The Defendants consent to such withdrawal.

In addition, I ask the Court to grant (i) a thirty (30) day extension of time to the Defendant's in order for them to obtain new counsel; (ii) grant an adjournment of a currently scheduled deposition noticed for June 25, 2008 to be adjourned until new Counsel shall have been obtained and (iii) grant an extension of discovery in this case to the end of August, 2008 in order that new counsel may respond appropriately to the action. Attached hereto is an Order evidencing my removal from this case.

In accord with such request, please note the following: 1. Two (2) previous requests for an adjournment or extension has been requested regarding the Defendants time to answer and file an amended answer. Such answers have now been filed; and 2. Counsel for Plaintiff has not consented to the enclosed requests. Currently, a deposition of Defendant William Donaldson is scheduled for June 25, 2008 at 9:30 A.M.



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The foregoing will affect scheduled dates, wherein the above deposition will need to be rescheduled and discovery was to be concluded by the end of June 2008. Such request will extend such deadline to August 31, 2008. The Answer, Amended Answer and Initial disclosures have been filed.

Finally, please note the Defendant's have aggressively and consistently pursued settlement of this matter. Unfortunately, the Parties are unable to come to an agreement.

Thank you for your consideration of the foregoing. Should there be any questions, I may be reached at the telephone number set forth below or (973) 472-8773, which is a direct dial phone number to my desk.

Very truly yours,

George Cacoulidis

CC: Michael Tiger, Esq.

<p>No withdrawal of counsel Absent new counsel. Pursue Settlement. Continue discovery. Settlement conference w/ the prosecutor &amp; the Court for 7/7/08 @ 9:00 AM</p>
<p>SO ORDERED: Date: <u>6/24/08</u> <u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.</p>